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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

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IN RE: UBER TECHNOLOGIES, INC., PASSENGER SEXUAL ASSAULT LITIGATION	Case No. 3:23-md-03084-CRB
	DECLARATION OF SARAH R. LONDON IN SUPPORT OF PLAINTIFF'S OPPOSITION TO DEFENDANTS' MOTION TO QUASH ADDITIONAL DEPOSITION OF HANNAH NILLES
This Document Relates to:	
Jaylynn Dean v. Uber Techs., Inc., N.D. Cal. No. 23-cv-06708 D. Ariz. No. 25-cv-4276	Judge: Honorable Charles R. Breyer Courtroom: 6 –17th Floor

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UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA
PHOENIX DIVISION

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JAYLYNN DEAN,	No. 25-cv-4276-PHX-CRB
Plaintiff,	Judge: Honorable Charles R. Breyer Ctrm.: 501
v.	
UBER TECHNOLOGIES, INC., et al.,	
Defendants.	

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DECLARATION OF SARAH R. LONDON
N.D. CAL. NO. 3:23-MD-03084; D. ARIZ. NO. 25-CV-4276

1   I, Sarah R. London, declare:

2   1.   I am an attorney in the law firm of Girard Sharp LLP, appointed Co-Lead and

3   Liaison Counsel for Plaintiffs in the above-captioned Multi-District Litigation. I am a member of

4   the State Bar of California and am admitted to practice before this Court. I make this declaration

5   based on my own personal knowledge. If called upon to testify, I could and would testify

6   competently to the truth of the matters stated herein.

7   2.   I submit this declaration in support of Plaintiff's Opposition to Defendants'

8   Motion to Quash Additional Deposition of Hannah Nilles.

9   3.   Uber's records show that Mr. Turay picked up Ms. Dean in a Toyota Camry.

10   4.   Mr. Turay told the police that the car was an Uber rental. Documents produced by

11   the Tempe Police department indicate that the Camry was registered to Fast Track Leasing. Fast

12   Track Leasing has publicly stated it has a partnership with Uber.

13   5.   Plaintiff's counsel have carefully reviewed Uber's document productions in this

14   matter and have no identified any evidence showing proof of insurance for Mr. Turay's Camy.

15   6.   The only proof of insurance Uber has produced is for a different vehicle entirely

16   (a Dodge).

17   7.   The proof of insurance Uber produced shows that the policy expired November

18   14, 2025, the day before Mr. Turay assaulted Ms. Dean.

19   8.   Uber did not include Hannah Nilles in its initial disclosures.

20   9.   Uber did not include Ms. Nilles as a live witness on its *Dean* trial witness list.

21   10.   Uber included Ms. Nilles as a witness-by-deposition, but only on the topics of

22   "Mr. Turay's background check and onboarding process."

23   11.   Attached as **Exhibit 1** is a true and correct copy of the deposition notice Plaintiff

24   served on Ms. Nilles through Uber's counsel.

25   I declare under penalty of perjury that the foregoing is true and correct. Executed this 2nd

26   day of January, 2025 in San Francisco, California.

27   */s/ Sarah R. London*
                                     Sarah R. London
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DECLARATION OF SARAH R. LONDON
N.D. CAL. NO. 3:23-MD-03084; D. ARIZ. NO. 25-CV-4276